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Counsel for Defendant O'CONNOR

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 11-814 MEJ (JW)
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER TO MODIFY CONDITIONS OF
)	RELEASE
)	
ROBIN O'CONNOR,)	
)	
Defendant.)	
_____)	

On March 26, 2012, defendant Robin O'Connor was sentenced to 21 months in custody. The Court permitted Ms. O'Connor to remain out of custody on her pretrial conditions of release and report on her own to her designated Bureau of Prisons facility. She has been notified that she is to report to FDC Dublin on June 25, 2012.

Ms. O'Connor now comes before the Court requesting a modification of her conditions of release. Currently, she is not authorized to leave the Northern District of California, and she also agreed to surrender her passport as a condition of release. However, her family will be moving to San Diego in early June, and she needs to be able to help her husband and children with the move prior to going into custody. In addition, her sister, who lives in Virginia, has agreed to take care of Ms. O'Connor's dogs while she is in custody, and Ms. O'Connor would

1 like to transport her dogs to Virginia for that purpose. Finally, Ms. O'Connor's husband will be
2 working in Costa Rica for three weeks in May, and she would like to take her two sons to visit
3 him during the week of Memorial Day. For that trip, she will need her passport, which she has
4 surrendered to the government.

5 Ms. O'Connor's pretrial services officer, Timothy Elder, has indicated that he has no
6 objection to any of Ms. O'Connor's proposed travel. Ms. O'Connor has been in strict
7 compliance with all of her conditions of release, sometimes doing more than necessary to ensure
8 that she is in compliance. In addition, Mr. Elder does not believe Ms. O'Connor poses a flight
9 risk, given the fact that she has two small children and that her husband has already made plans
10 to move to San Diego with them. As such, Mr. Elder has no objection to lifting the travel
11 restriction from Ms. O'Connor's conditions of release, as long as Ms. O'Connor provides pretrial
12 services with all of her travel information, including her itinerary, lodging, and contact
13 information. He also has no objection to Ms. O'Connor receiving her passport for the purpose of
14 traveling to Costa Rica, as long as she returns it prior to going into custody. The government
15 also has no objection.

16 For good cause shown, the parties hereby stipulate and agree that Ms. O'Connor's
17 conditions of release shall be modified such that the pretrial services officer has the discretion to
18 permit her to travel outside the Northern District of California. The parties further agree that Ms.
19 O'Connor shall receive her passport back for the purpose of travel to Costa Rica, and that she
20 will re-surrender her passport upon return.

21
22 IT IS SO STIPULATED.
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24
25

MELINDA HAAG
United States Attorney

4/17/12

/s/

DATED

THOMAS STEVENS
Assistant United States Attorney

GEOFFREY HANSEN
Acting Federal Public Defender

4/17/12

/s/

DATED

RITA BOSWORTH
Assistant Federal Public Defender

In light of the parties' stipulation, it is hereby ORDERED that the defendant's conditions of release shall be modified such that Pretrial Services shall have the discretion to permit the defendant to travel outside of the Northern District of California. The defendant's conditions shall further be modified such that she may retrieve her passport for travel to Costa Rica in May, and she will again surrender her passport upon return to the United States and prior to reporting to FDC Dublin to serve her sentence.

April 17, 2012

DATED


MARIA ELENA JAMES
United States Magistrate Judge